

Scott E. Brady, Esq. (IN #30534-49)
Quilling, Selander, Lownds, Winslett & Moser, P.C.
10333 North Meridian Street, Suite 200
Indianapolis, IN 46290
Telephone: (317) 497-5600, Ext. 602
Fax: (214) 871-2111
E-Mail: sbrady@qlwm.com
Counsel for Defendant Trans Union, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA

LAUREN NICOLE KNECHT,
Plaintiff,

CASE NO.

vs.
TRANS UNION LLC,
Defendant.

**TRANS UNION, LLC'S NOTICE OF
REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“Trans Union”), hereby removes the subject action from the State of North Dakota District Court of Cass County to the United States District Court for the District of North Dakota on the following grounds:

1. Plaintiff Lauren Nicole Knecht served Trans Union on or about February 5, 2024, with a Summons and Complaint filed in the State of North Dakota District Court of Cass County. Copies of the Summons and Complaint are attached hereto, as **Exhibit A** and **Exhibit B**, respectively. No other process, pleadings or orders have been served on Trans Union.
2. Attached hereto as **Exhibit C** is a copy of Trans Union, LLC's Notice of Filing Notice of Removal with the United States District Court to be filed in the State of North Dakota District Court of Cass County.

3. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Complaint ¶¶ 20 - 24.

4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

5. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the State of North Dakota District Court of Cass County to the United States District Court for the District of North Dakota.

6. Notice of this removal will promptly be filed with the State of North Dakota District Court of Cass County and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the State of North Dakota District Court of Cass County to United States District Court for the District of North Dakota.

Respectfully submitted,

QUILLING, SELANDER, LOWNDS, WINSLETT
& MOSER, P.C.

Date: February 26, 2024

/s/ Scott E. Brady

Scott E. Brady, Esq. (IN #30534-49)
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Counsel for Defendant Trans Union, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **26th day of February, 2024**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, and/or e-mail on the **26th day of February, 2024**, properly addressed as follows:

<u>for Plaintiff Lauren Nicole Knecht</u> Catrina Smith, Esq. Minndak Law, PLLC 625 Main Avenue, Suite 152 Moorhead, MN 56560 csmith@minndaklaw.com	
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/s/ Scott E. Brady

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